

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NEW JERSEY DEPARTMENT OF
ENVIRONMENTAL PROTECTION, et al.,

Plaintiffs,

v.

E. I. DU PONT DE NEMOURS AND
COMPANY, et al.,

Defendants.

Civil Action No. 1:19-cv-14766-RMB-JBC

Stipulation and [Proposed] Order

**STIPULATION AND [PROPOSED] ORDER FOR THE DEADLINE TO AMEND
INITIAL DISCLOSURES AND TO EXTEND THE DEADLINE TO SERVE REQUESTS
FOR ADMISSION**

WHEREAS, the New Jersey Department of Environmental Protection, Commissioner of the Department, and Administrator of the New Jersey Spill Compensation Fund (“Plaintiffs”), and EIDP, Inc. (f/k/a E. I. du Pont de Nemours and Company); The Chemours Company; The Chemours Company FC, LLC; DuPont Specialty Products USA, LLC; Corteva, Inc.; and DuPont de Nemours, Inc.; and 3M, Company (“Defendants,” and together with Plaintiffs, the “Parties”) have conferred on amending and supplementing their Rule 26(a)(1) Initial Disclosures and extending the deadline to serve Requests for Admission in the Chambers Works action;

WHEREAS, the Initial Disclosures were previously (and timely) served;

WHEREAS, the current deadline to serve Requests for Admission is February 7, 2025.

See, 10/18/24 Email Order.

IT IS HEREBY STIPULATED by, between, and among the Parties, by and through their respective counsel, that:

- 1) The Parties may amend and supplement their previously served Initial Disclosures by February 21, 2025; and
- 2) The current deadline for the Parties to serve Requests for Admission is modified from February 7, 2025 to February 21, 2025.

Dated: February 6, 2025

For Plaintiffs:

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Counsel for Defendants EIDP, Inc., f/k/a E. I. du Pont de Nemours and Company (as to all claims except (i) the fraudulent transfer claims; and (ii) the ISRA claims); The Chemours Company; and The Chemours Company FC, LC (as to all claims except the fraudulent transfer claims)

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For Defendants E. I. du Pont de Nemours and Company (as to the ISRA Claim in 1:19-cv-14766-RMB-JBC), DuPont Specialty Products USA, LLC, Corteva, Inc. (as to claims other than fraudulent transfer claims), and DuPont de Nemours, Inc. (as to claims other than fraudulent transfer)

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For Defendant 3M Company

SO ORDERED

 2/7/25
Hon. Joel Schneider (Ret.), Special Master

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2025 a true copy of this Stipulation and Order was served on all counsel of record via electronic mail.

/s/ Ryan Richman
Ryan Richman